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Attorneys for State Street Bank and Trust Company

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
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**STATEMENT OF STATE STREET BANK AND TRUST COMPANY
IN SUPPORT OF REQUEST OF OPERATING COMPANY CREDITORS
FOR AN ORDER SCHEDULING A DISCLOSURE STATEMENT HEARING
AND APPROVING THE FORM AND MANNER OF NOTICE THEREOF**

TO THE HONORABLE JAMES M. PECK,
UNITED STATES BANKRUPTCY JUDGE:

State Street Bank and Trust Company submits this statement in support of the request of the operating company creditors (the “Operating Company Creditors”) for any alternative disclosure statements that may be filed to be considered concurrently with that of the Debtors’ disclosure statement at the hearing scheduled for June 28, 2011 [contained in Docket Nos. 15668, 15825]. As grounds, State Street states:

1. On March 29, 2011, an ad hoc group of holding company creditors moved to proceed with its proposed plan of reorganization on the same schedule as the Debtors’ proposed plan [Docket No. 15431].

2. On April 6, 2011, the Operating Company Creditors filed a response [Docket No. 15668] requesting that the ad hoc group's proposal be modified to incorporate other potential plan proponents.

3. State Street is a substantial creditor of an operating company debtor, Lehman Commercial Paper, Inc.

4. State Street believes it would be immensely salutary to afford creditors with claims against operating companies the opportunity to consider a non-consolidation plan alongside the proposed substantive consolidation plans.

5. As a practical matter, permitting a group to proceed with a non-consolidation plan would also represent progress in the pending dispute regarding the Debtors' proposed discovery protocol. Such a group would become the natural coordination center for discovery efforts of creditors that oppose consolidation.

WHEREFORE, for the reasons set out in the Operating Company Creditors' response and their reply memorandum filed on April 11, State Street believes that the relief they seek should be allowed.

Dated: April 11, 2011
Boston, MA

Respectfully submitted,

By: /s/ Sabin Willett
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